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December 20, 2024

VIA ECF

Hon. Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080

Dear Judge Martinotti:

Pursuant to CMO # 5, the parties provide the following status update for the weeks ending June 20 and June 27.

1. On June 21, 2025, Defendants provided edits to the draft deposition protocol. Plaintiffs are reviewing Defendants' revisions.
2. The parties submitted a stipulation to amend the Direct Filing Order (CMO 9, ECF No. 180) to update the service lists for certain of the Defendants in the MDL. ECF No. 615.
3. Defendants filed oppositions to Puerto Rico's motion for leave to amend their complaint on June 23, 2025, ECF No. 622 and 623. The parties are negotiating a briefing schedule for Puerto Rico's reply.
4. The parties have agreed that each side shall have 30 minutes for the constructive notice hearing.
5. Defendants proposed and the parties met and conferred regarding a proposed CMO regarding dispute resolution procedures, including the procedure for filing a motion to compel arbitration or dismiss pursuant to the FAA.
6. The parties continue to discuss a briefing schedule regarding the State AG Plaintiff responses to the PFS.

7. The parties continued their conferrals on various discovery issues.

Additionally, attached hereto please find a list of pending motions.

The parties thank the Court for its continued attention to this matter.

Respectfully submitted,

/s/ Matthew F. Gately

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Class Action Track

/s/ David R. Buchanan

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/s/ Joanne Cicala

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/s/ John D. Tortorella

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cc: all counsel of record (via ECF)